

REMARKS

Status Summary

Claims 1-17 and 24-28 are pending in the present application. Claims 18-23 and 29-37 have been withdrawn from consideration as being drawn to a non-elected invention and are hereby canceled without prejudice or disclaimer. Applicants reserve the right to pursue these claims in one or more divisional applications. Claims 13-15 and 25-26 have been indicated as allowable, and claims 1-12, 16, 17, 24, 27, and 28 presently stand rejected.

Allowable Claims

Applicants acknowledge with appreciation the indication of allowability of claims 13-15 and 25-26, of which claims 13, 25, and 26 have been placed in independent form by this Amendment.

It will be understood that the scopes of claims 13-15 and 25-26 have not been narrowed or even changed by this Amendment. Moreover, since these claims have already been indicated as allowable, they have not been amended for reasons related to the statutory requirements for a patent but simply to expedite prosecution of this application. Accordingly, the amendment of these claims does not raise any presumptions regarding, nor trigger the application of the doctrine of prosecution history estoppel to limit the range of equivalents.

Claim Rejection - 35 U.S.C. § 102(e)

Claims 1-4, 6-7, 16-17, 24 and 28 stand rejected by the Examiner under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,421,674 to Yoakum et al., hereinafter referred to as "Yoakum". These rejections are respectfully traversed because claims 1-4, 6-7, 16-17, 24 and 28 positively recite limitations that are not disclosed (nor suggested) in Yoakum.

Claim 1 defines a session initiation protocol (SIP) signaling router that includes a plurality of cluster nodes for performing at least one session initiation protocol function, each cluster node storing a local database containing SIP location information, and a location server coupled to the cluster nodes for maintaining a database of SIP location information and for automatically replicating the database of SIP location information to each of the cluster nodes in real time in response to receiving updates to the SIP location information.

Since the database of SIP location information is automatically replicated to each of the cluster nodes, the cluster nodes each contain their own local copies of the SIP location database. As described in the present specification, for example beginning at page 8, line 20, this arrangement greatly increases routing speed over conventional SIP proxy servers that depend on a centralized location database.

Claim 1 defines a location server coupled to the cluster nodes for maintaining a database of SIP location information and for automatically replicating the database of SIP location information to each of the cluster nodes. Accordingly, since the location information is replicated to each of the cluster nodes, the cluster nodes contain common

SIP location information. Nevertheless, claim 1 has been amended to more distinctly point out that "each of the cluster nodes contain common SIP location information."

In paragraph 8 of the Official Action, the Examiner contends that Yoakum discloses a location server for automatically replicating the database of SIP location information to each of the cluster nodes, as defined in claim 1. Applicant disagrees.

Yoakum relates to a system for implementing a real time distributed hierarchical database. The system is arranged with a master proxy server that receives a message and performs a lookup based on information in the message. The Master proxy server contains pointers to other proxy servers at lower hierarchical levels. If the master proxy server can not obtain the information requested by the message, then a second message is created and forwarded to another proxy server at a lower hierarchical level that contains the requested information or the address of another server at an even lower hierarchical level that that can obtain the requested information. (See col. 4, ll. 13-60 and col. 8, l. 58 to col. 9, l. 41).

Yoakum does not disclose (nor suggest) that a database of SIP location information is automatically replicated to each of the cluster nodes. Moreover, Yoakum does not disclose (nor suggest) that each of the cluster nodes contain common SIP location information. In contrast, Yoakum discloses a distributed hierarchical database that includes different subscriber information in different servers. For example, Yoakum discloses at col. 4, ll. 13-18 (with reference to Figure 2):

Proxy server **208** can be a SIP proxy server that implements the first level of a database hierarchy. For example, proxy server **208** can include a database that stores records containing the requested information for some subscribers and records containing pointers to other databases for other subscribers.

Yoakum also discloses at col. 4, ll. 28-32 (with reference to Figure 2):

If proxy server **208** has the requested information, proxy server **208** can respond to the message from gateway **204** sending a response containing the results of the lookup to gateway **204**. However, proxy server **208** might not have the requested information in its local database. In this case, results from the first database lookup can include the location of a second database where the desired information is located.

Accordingly, since Yoakum fails to disclose each and every feature of the claim 1 for at least the above reasons, claim 1 and dependent claims 2-4, 6-7 and 16-17 are not anticipated by Yoakum. In addition, method claims 24 and 28 include analogous features and are not anticipated by Yoakum for at least the same reasons. It is respectfully submitted that claims 1-4, 6-7, 16-17, 24 and 28 are in proper condition for allowance.

Claim Rejection - 35 U.S.C. § 103

Claims 8-12 stand rejected by the Examiner under 35 U.S.C. § 103(c) as being obvious over Yoakum in view of U.S. Patent No. 6,779,039 to Bommareddy et al., hereinafter referred to as "Bommareddy". These rejections are respectfully traversed because claims 8-12 positively recite limitations that are not disclosed nor suggested in the combination of Yoakum and Bommareddy at least for the same reasons discussed above with reference to claim 1, from which claims 8-12 depend.

Bommareddy does not cure the deficiencies discussed above with reference to Yoakum. Bommareddy relates to a router clustering system that connects two or more routers to ISPs in a complete high-availability arrangement. Bommareddy does not disclose nor suggest that a database of SIP location information is automatically

replicated to cluster nodes or that each of the cluster nodes contain common SIP location information.

Accordingly, Yoakum and Bommareddy, alone or in combination, fail to disclose or suggest all of the claim limitations and thus fail to establish a prima facie case of obviousness for at least the above reasons. Thus, the obviousness rejections of claims 8-12 should be withdrawn and it is respectfully submitted that claims 8-12 are in proper condition for allowance.

Claims 5 and 27 stand rejected by the Examiner under 35 U.S.C. § 103(c) as being obvious over Yoakum in view of U.S. Patent No. 6,088,721 to Lin et al., hereinafter referred to as "Lin". These rejections are respectfully traversed because claims 5 and 27 positively recite limitations that are not disclosed nor suggested in the combination of Yoakum and Lin at least for the same reasons discussed above reference to claims 1 and 24, from which claims 5 and 27 depend.

Lin relates to a protocol that provides assurance of consistent replication of objects from a server to caching servers over data communications networks. The objects are stored temporarily in a transient manner on caching servers to reduce bandwidth requirements. Lin does not disclose or suggest SIP location database replication and/or storage in accordance with claims 1 or 24. For example, Lin does not disclose SIP location information being automatically replicated to cluster nodes or cluster nodes containing common SIP location information.

Accordingly, Yoakum and Lin, alone or in combination, fail to disclose or suggest all of the claim limitations for at least the above reasons and thus fail to establish a prima facie case of obviousness for at least the above reasons. Thus, the obviousness

rejections of claims 5 and 27 should be withdrawn and it is respectfully submitted that claims 5 and 27 are in proper condition for allowance.

CONCLUSION

In light of the above amendments and remarks, it is respectfully submitted that the present application is now in proper condition for allowance, and an early notice to such effect is earnestly solicited.

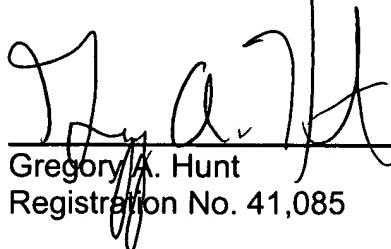
If any small matter should remain outstanding after the Patent Examiner has had an opportunity to review the above Remarks, the Patent Examiner is respectfully requested to telephone the undersigned patent attorney in order to resolve these matters and avoid the issuance of another Official Action.

DEPOSIT ACCOUNT

The Commissioner is hereby authorized to charge any fees associated with the filing of this correspondence to Deposit Account No. 50-0426.

Respectfully submitted,

JENKINS, WILSON & TAYLOR, P.A.



By: _____
Gregory A. Hunt
Registration No. 41,085

Date: 3-15-05

By:

1322/66 TT/GAH/cht/sed

Customer No: 25297